

Exhibit 4

United States of America ex rel. Ven-A-Care of the Florida Keys, Inc., et al.
v. Dey, Inc., et al., Civil Action No. 05-11084-PBS

**Exhibit to the March 10, 2010 Declaration of Sarah L. Reid in Support of Dey
Defendants' Response to Plaintiffs' Motion Concerning The Use of Depositions**

1 UNITED STATES DISTRICT COURT

2 FOR THE DISTRICT OF MASSACHUSETTS

3 -----X

4 IN RE: PHARMACEUTICAL INDUSTRY) MDL No. 1456

5 AVERAGE WHOLESALE PRICE) Civil Action No.

6 LITIGATION) 01-12257-PBS

7 -----X

8 THIS DOCUMENT RELATES TO:) Hon. Patti B.

9 United States of America ex rel.) Saris

10 Ven-A-Care of the Florida Keys,)

11 Inc. v. Dey, Inc., et al., Civil)

12 Action No. 05-11084-PBS; and)

13 United States of America ex rel.)

14 Ven-A-Care of the Florida Keys,)

15 Inc. v. Boehringer Ingelheim)

16 Corp., et al., Civil Action No.)

17 07-10248-PBS)

18 -----X

19 VIDEOTAPED DEPOSITION OF THE OREGON DEPARTMENT

20 OF HUMAN SERVICES by JESSE ANDERSON

21 PURSUANT TO FEDERAL RULE 30(B)(6)

22 TUESDAY, DECEMBER 16, 2008

1 Q. When did you meet with Mr. Davis and
2 speak with Ms. Thomas?

3 MR. DAVIS: I'm going to object and
4 direct you not to -- on the basis of
5 attorney/client privilege, and direct you not to
6 discuss the content of communications between you
7 and myself or between you and Ms. Thomas.

8 THE WITNESS: (Nods head.)

9 Q. BY MR. HEINZ: So I'll repeat my
10 question: When did you speak with Mr. -- Mr.
11 Davis and Ms. Thomas?

12 MR. DAVIS: You can -- You can answer
13 that question, so long as you are not discussing
14 the substance of the conversations.

15 THE WITNESS: Last week.

16 Q. BY MR. HEINZ: Do you remember the day?

17 A. I believe it was Friday.

18 Q. So that would be the 12th of December?

19 A. Correct.

20 Q. How long did you speak with Mr. Davis
21 and Ms. Thomas?

22 A. About an hour, hour and a half.